

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

CASE NO: 2024-24000812-FY

FILED - KZ
October 23, 2024 2:18 PM
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
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1:24-cv-1110
Paul L. Maloney
U.S. District Judge

PLAINTIFF:

MELVIN LAMONT CLINTON,
1121 Columbus
Benton Harbor, Michigan, 49022

v.

DEFENDANTS:

STATE OF MICHIGAN,
7TH DISTRICT COURT VAN BUREN,
JUDGE ARTHUR H. CLARKE III,
OFFICER MIKE KNIZEWSKI - SOUTH HAVEN POLICE DEPARTMENT,
and other UNKNOWN DEFENDANTS.

COMPLAINT FOR FALSE ARREST AND RELATED RELIEF

Plaintiff, Melvin Lamont Clinton, brings this complaint against the State of Michigan, 7th District Court Van Buren, Judge Arthur H. Clarke III, Officer Mike Knizewski, and other named or unknown defendants, stating as follows:

I. PARTIES

1. Plaintiff, Melvin Lamont Clinton, is a 23-year-old resident of Benton Harbor, Michigan, who was wrongfully arrested and charged in connection with Case ID 2024-24000812-FY.
2. Defendant, State of Michigan, operates and is responsible for law enforcement through its agencies, including the 7th District Court Van Buren.
3. Defendant, Judge Arthur H. Clarke III, was the presiding judge over the matters related to Plaintiff's case.
4. Defendant, 7th District Court Van Buren, is the court responsible for overseeing the case against Plaintiff.
5. Defendant, Officer Mike Knizewski, was the arresting officer from the South Haven Police Department.

II. JURISDICTION AND VENUE

6. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 (Federal Question Jurisdiction) and 42 U.S.C. § 1983 (Civil Rights Violations).
7. Venue is proper in this Court as the events giving rise to this action occurred within this district.

III. FACTUAL BACKGROUND

8. On September 8, 2024, Plaintiff was arrested by Officer Mike Knizewski of the South Haven Police Department, charged with Assault with a Dangerous Weapon (Felonious Assault) under MCL 750.82, and Domestic Violence under MCL 750.812.

9. Plaintiff was arraigned on September 9, 2024, with both charges treated as felony and misdemeanor, respectively.

10. Plaintiff posted a \$3,000 cash bond on September 12, 2024, which was set by Judge Arthur H. Clarke III, allowing his release pending the resolution of the case.

11. Throughout the proceedings, Plaintiff maintained his innocence, asserting that there was no probable cause to justify the charges or arrest.

12. On October 2, 2024, all charges against Plaintiff were dismissed through an Order of Nolle Prosequi, which officially closed the case and terminated all legal actions against Plaintiff.

13. Despite the dismissal of all charges, Plaintiff had suffered damage to his reputation, endured the stress of legal proceedings, and incurred financial losses, including the bond amount.

14. The arrest and prosecution were carried out without sufficient evidence or legal justification, constituting a false arrest and violation of Plaintiff's rights under the Fourth and Fourteenth Amendments of the United States Constitution.

IV. CAUSES OF ACTION

COUNT I - FALSE ARREST

15. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

16. Plaintiff was arrested without a valid warrant, probable cause, or any legal justification.

17. Defendants, acting under color of law, unlawfully detained Plaintiff without proper legal process, resulting in a violation of Plaintiff's rights under the Fourth and Fourteenth Amendments to the United States Constitution.

18. As a direct result of Defendants' actions, Plaintiff suffered damages, including but not limited to, emotional distress, damage to reputation, financial loss, and loss of liberty.

COUNT II - MALICIOUS PROSECUTION

19. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

20. Defendants initiated or continued legal proceedings against Plaintiff without probable cause, with malice, and for an improper purpose.

21. The prosecution of Plaintiff's case was terminated in Plaintiff's favor on October 2, 2024, through an Order of Nolle Prosequi dismissing all charges.

22. As a result of this malicious prosecution, Plaintiff suffered emotional and financial harm.

COUNT III - ABUSE OF PROCESS

23. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

24. Defendants misused legal procedures, including the issuance of unwarranted charges and setting of bail, to accomplish an unlawful purpose.

25. This abuse of process caused Plaintiff undue stress, financial burden, and harm to his reputation, despite the charges being dismissed.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

1. Compensatory damages in an amount to be determined at trial;
2. Punitive damages against individual Defendants for their willful, wanton, and reckless conduct;
3. An order declaring Defendants' actions as unlawful;
4. Costs, attorney fees, and any other relief the Court deems just and equitable.

VI. DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all claims so triable.

Dated: 10-23-24

Respectfully submitted,



Melvin Lamont Clinton

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